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FW: Telling Truth:1. Fixing Cost Estimate Error using Cap Rate in PV. And 2. Undisclosed Dioxins

To: "cms.oex@domino.epamail.epa.gov" <cms.oex@domino.epamail.epa.gov>

From: Hope, Brian

Sent: Monday, March 19, 2018 12:24:51 PM (UTC+00:00) Monrovia, Reykjavik

To: CMS.OEX

Subject: Fwd: Telling Truth:1. Fixing Cost Estimate Error using Cap Rate in PV. And 2. Undisclosed Dioxins

Sent from my iPhone

Begin forwarded message:

From: Non-Responsive

Date: March 18, 2018 at 10:44:28 AM EDT

To: Brian Hope <hope.brian@epa.gov>

Subject: Telling Truth:1. Fixing Cost Estimate Error using Cap Rate in PV. And 2. Undisclosed Dioxins

Good morning, Brian Hope.

Region 5 ROD ID# OHD980612188 deliberately leaves untreated solids & sludge deemed solid once removed from ~51,500 55-gal drums. These long-term non-treated hazardous waste extend life cycles beyond 30 years requiring capitalization rate correction.

Region 5 Admin argues it's just like any other new Superfund site. Wrong.... Any other site intake has treatment standards. Region 5 Administrator's signature to ROD ESD without correcting from 7% to 0.7% cap rate [then] is at least negligence. ROD PV estimate is roughly \$28M using 7% cap rate. Correcting cap rate to long-term rate makes PV estimate \$280M – a \$252,000,000 error. If 3 relinings/century * 2 + 1 at beginning = 7 cycles. 7 * \$28M = \$196M + other O&M\$ at 200 yrs * \$0.5M/yr = \$100M. Total as \$296M is ~6% above estimate as possible costs for non-treatment. \$16M short at 2 centuries is closer than \$252M short in 30 years. Do we not teach high priced administrators and long time staff how to use the 76 pages of EPA 540-R-00-002, “A Guide to Developing and Documenting Cost Estimates During the Feasibility Study”??

Non-disclosure of PCP sourced Dioxins & Furans impurities and lack of accounting for these treatment costs also is at least negligence. In one drum, untreated life cycle of 2,900,000 ug/kg PCP [Pg 1840 of RI] as 5,319 total ug/kg of dioxin & furans impurities [1979 disposal] lasts centuries. 3 Drums PCP @ 660K, 650K, 160K, 11 @ 40K. All solids from total sample size of 50. 30% of samples report measurable yet non-disclosed dioxin content that by ROD would go untreated. If fully applicable, that's >15K drums with untreated dioxin. This is based on Midland, MI clean up standard of dioxins & dlc's above 50 ppt. See NRRB warning re: O&M. Compare NRRB Raritan file to Region 5 staff & administrator's acceptance of WM comments that becomes ROD. WM's ROD applies 7% without correction even though non-treatment extends time. Region 5 records center file #390119, pg 328 of 477 is OEPA email "Follow-Up to Yesterday's Phone Call" 07/27/2007 to Joan Tanaka highlights prerequisites for dioxin waste. Sealed drums are put into 50 separate in-ground cells in 1979. Dioxins come out of ground & out of sealed drums after 2010 ROD. Has leaving dioxins untreated & undisclosed, become treatment to maximum extent practicable? US DOE owns untreated waste and is named in special notice letter to a now joint & severally liable stew based ROD. DOE does not return calls. US Dept of Ag & USA own mortgage to ~350 of 500 acres of Tremont City site restricted lands in 2 counties & congressional districts. Site has multiple re-use options but recalcitrant Region 5 will not discuss brownfield funding. How is this allowed? Will DOE cause US tax payers be at the bottom of the hill as mixed drum waste rolls downhill? Does using page #2 of OMB Circular A-94 as long term rate in PV formula address the cost of long-term deliberate non-treatment of wastes presenting hazardous characteristics?